

## DISTRICT ATTORNEY KINGS COUNTY

350 JAY STREET BROOKLYN, NY 11201-2908 (718) 250-2000 WWW.BROOKLYNDA.ORG

> [INSERT NAME] Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]

Kings County Dkt./Ind. No. [#######]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: MICHAEL CONSTANTINOU

MOS TAX:

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in <a href="mailto:limine">limine</a> to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

## Disclosure # 1:

MOS CONSTANTINOU ENTERED A PLEA OF GUILTY TO THE FOLLOWING DEPARTMENTAL CHARGES WHILE ASSIGNED TO THE 114TH PRECINCT:

- MOS CONSTANTINOU, WHILE OFF DUTY, ON OR ABOUT JULY 7, 2007, IN QUEENS COUNTY, DID
  ENGAGE IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY AND DISCIPLINE OF THE
  DEPARTMENT IN THAT SAID MOS, BECAME INVOLVED IN A PHYSICAL DISPUTE WITH AN INDIVIDUAL
  KNOWN TO THE DEPARTMENT, AND DID GRAB AND TWIST THE ARM OF SAID INDIVIDUAL, THROWING
  HER TO THE GROUND WHICH RESULTED IN AN ABRASION TO HER ARM.
- MOS CONSTANTINOU, ON OR ABOUT JULY 7, 2007, IN QUEENS COUNTY, DID ENGAGE IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY AND DISCIPLINE OF THE DEPARTMENT, TO WIT: SAID MOS DID MAKE THREATENING REMARKS TO AN INDIVIDUAL KNOWN TO THE DEPARTMENT, AND WITH WHOM HE HAD BEEN PREVIOUSLY INVOLVED IN A PHYSICAL DISPUTE BY STATING, "IF YOU TOLD ANYONE, I HAVE A BULLETT FOR YOU.".
- 3. MOS CONSTANTINOU ON OR ABOUT SOMETIME IN APRIL 2007, IN QUEENS COUNTY, DID ENGAGE IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY AND DISCIPLINE OF THE DEPARTMENT, TO WIT: SAID MOS DID ACT IN A THREATENING MANNER TOWARDS AN INDIVIDUAL KNOWN TO THE DEPARTMENT DURING A DOMESTIC DISPUTE BY PLACING HIS FIREARM UP TO HER HEAD BY STATING, "I HAVE A BULLET FOR YOU, WE COULD END THIS NOW, YOUR LIFE IS MISERABLE AND MY LIFE IS MISERABLE."

CASE STATUS: CLOSED ON 03/25/2009

ACTION TAKEN: DISMISSAL PROBATION FOR ONE (1) YEAR, THIRTY-ONE (31) SUSPENSION DAYS, AND COMPLETE ANY AND ALL COUNSELING PROGRAMS AS DETERMINED BY THE DEPARTMENT.

## Disclosure # 2:

THE NYPD SUBSTANTIATED THE FOLLOWING ALLEGATION(S), DATED 05/15/2010, AGAINST MOS CONSTANTINOU:

 MOS CONSTANTINOU, ASSIGNED TO THE 81<sup>ST</sup> PRECINCT, THE MOS WAS APPROACHED BY A PERSON KNOWN TO THE DEPARTMENT AND WAS ADVISED OF A SITUATION THAT REQUIRED HIM TO PREPARE A DOMESTIC INCIDENT REPORT. SAID MOS DID FAIL TO PREPARE A DOMESTIC INCIDENT REPORT AS REQUIRED IN PATROL GUIDE PROCEDURE. SAID MOS FURTHER FAILED TO MAKE ACTIVITY LOG ENTRIES RELATED TO THE INCIDENT IN QUESTION, ALSO IN VIOLATION OF PATROL GUIDE PROCEDURE.

CASE STATUS: CLOSED ON 10/27/2011

ACTION TAKEN: SCHEDULE B COMMAND DISCIPLINE AND LOSS OF FIVE (5) VACATION DAYS

## BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.

Eric Gonzalez District Attorney Kings County